

REMARKS

In the Office Action, the Examiner has rejected pending claims 1 through 33. Specifically, claims 1, 5 through 11, 14 through 20, 22 and 23 stand rejected under 35 USC 103(a) as obvious over U.S. Patent No. 5,802,299 to Logan, et al. ("Logan") in view of John Pollock's web article entitled "Resizing Images" ("Pollock"). Claims 2 and 21 also stand rejected as obvious over Logan and Pollock in view of the W3C's Proposed HTML 4.01 Recommendation of August 24, 1999 ("W3C-97"). Similarly, claims 3 and 4 stand rejected as obvious over Logan, Pollock and W3C-97 in view of U.S. Patent No. 6,396,500 to Qureshi ("Qureshi"). Finally, claims 12 and 13 stand rejected as obvious over Logan and Pollock in view of U.S. Patent No. 6,097,441 to Allport ("Allport").

The Examiner objects to claim 6 under 37 CFR 1.75(c) as being of improper dependent form for failing to further limit the subject matter of a previous claim. Applicants respectfully disagree. In the instant application, Independent claim 1 claims the step of "distributing the content pages to the viewers". Claim 5, which depends on independent claim 1, adds the element of "storing . . . sequence data specifying a presentation sequence for the templates." Claim 6, which depends on dependent claim 5, modifies the scope of the distributing step introduced in claim 1 by claiming a specific methodology for distributing content pages. More specifically, claim 6 modifies the step of distributing by "distributing in with the sequence data contained in the album data structure", which was introduced in dependent claim 5. For this reason, claim 6 is of proper dependence for as it modifies the scope of a previous claim from which it depends, e.g., claim 1.

The Examiner further objects to certain references cited in the Information Disclosure Statement filed on May 15, 2003 as failing to comply with 37 CFR 1.98(a)(2). A supplemental Information Disclosure Statement is submitted herewith pursuant to 37 C.F.R. §§ 1.97 and 1.98. In the enclosed Citation List, the Hendricks reference (U.S. Patent No. 5,659,350) is identified and is accompanied by a legible copy of the patent in its entirety. Applicants respectfully request that the Examiner consider the enclosed documents, make them of record, and indicate his consideration of the documents by initialing the enclosed Citation List adjacent the citation of the document. Please return a copy of the initialed Citation form to the Applicant's undersigned Attorney.

In rejecting pending independent claims 1, 17, 20 through 22 and 29, the examiner is combining the Pollock reference with one or more other references to conclude that the claims are obvious under 35 USC 103(a). Each of the pending independent claims comprise the element of either templates that identify one or more transformation techniques (claims 1, 20, 22 and 29) or one or more transformation techniques specified in the templates (claims 17 and 21). The Examiner contends that Pollock teaches a method of adding a transformation technique to a web page, which reads onto this element and thereby renders the claims obvious.

Pollock does not teach transformation techniques as presently claimed. Instead, Pollock is a tutorial that instructs an author of an HTML page how to set parameters to define the display size of an image in pixels. According to current HTML specifications, the "IMG" tag defines an image within a web page. Within the scope of an IMG tag, height and width parameters allow a page author to set values in pixels for these parameters. When the page is rendered by a rendering application, e.g., a web

browser, the application interprets the parameters within an IMG tag to render the image at the appropriate pixel size. The disclosure of Pollock solely teaches an author of a web page how to prepare a properly formatted piece of HTML code.

Turning to independent claim 1, the claim presents a method for organizing content available from a plurality of locations for presentation to viewer. According to the method, a plurality of templates each identifies one or more transformation techniques to be applied to content. Content is captured from one or more locations specified in the template, with the content transformed in accordance with the transformation techniques specified in the template. The transformed content is inserted into the templates to thereby create a set of content pages. Similarly, independent claim 20 is directed to a computer readable medium storing program code that, when executed, causes a computer to execute a method that substantially analogous to the method of claim 1. Contrary to the elements of claims 1 and 20, Pollock does not teach templates or their use of transformation techniques to create content pages. Pollock simply instructs an author of a content page as how to properly define the size in which an application renders an image. Pollock, therefore, fails to teach transformation techniques as claimed. For at least these reasons, Applicant's respectfully request withdrawal of the rejection an allowance of independent claims 1 and 20.

According to independent claim 17, a capture engine captures content from one or more locations specified in a plurality of templates. A display engine transforms the captured content from each of the locations in accordance with the one or more transformation techniques specified in the templates and inserts the transformed content into the templates to thereby create a set of content pages. As discussed above,

Pollock teaches an author how to prepare a properly formatted web page by setting values for parameters that define the size of an image, as opposed to transformation techniques specified in a template that are used by a display engine to transform content and insert the transformed content into the template to thereby create a set of content pages. As Pollock fails to teach transformation techniques as claimed, Applicants assert that independent claim 17 is not obvious in view of the prior art. Withdrawal of the rejection and allowance of independent claim 17 is respectfully requested.

Independent claim 21 is directed to a method for creating an Internet album. The method comprises storing a plurality of templates. Each template specifies one or more Internet site, a slot for each Internet site adapted to hold content retrieved from the Internet site, and a transformation technique for transforming the content. For a given slot in the template, content is retrieved from the Internet site for the given slot and a transformation technique is applied to the retrieved content. The transformed content is entered into the slot and the steps are repeated for each slot in the template to create a plurality of album pages containing the content, which are organized into an Internet album in accordance with a defined ordering scheme. As is the case in the previously discussed independent claims, Pollock fails to teach templates that specify a transformation technique. As the art cited by the Examiner fails to teach or suggest every element of the claim, Applicants assert that independent claim 21 is not obvious in view of the prior art. Withdrawal of the rejection and allowance of independent claim 21 is respectfully requested.

Further regarding independent claim 21, the Examiner asserts that W3C 97 teaches inserting content into slots. The Examiner acknowledges Applicants assertion

that W3C would ultimately not be found to constitute prior art. The Examiner, however, counters that he has identified an earlier version of the reference whose content are the same for the given chapter. Unfortunately, Applicants are unaware of the reference to which the Examiner is referring. On form PTO-892 ("Notice of References Cited"), the Examiner cites "HTML 4.0 Specification, W3C Recommendation," 18 December 1997, available at <http://www.w3c.org/TR/REC-html40-971218/Chapter 18>. An examination of this reference reveals that it teaches scripting techniques within HTML pages and is silent regarding the claimed element of inserting content into slots. Applicants respectfully request that the Examiner clarify the reference over which he is rejecting independent claim 21. Absent any clarification, Applicants respectfully request withdrawal of the rejection and allowance of the same.

Finally, independent claims 22 and 29 both claim a system that comprises a set of templates used to generate a set of corresponding content pages, each template identifying one or more transformation techniques to be applied to the content to thereby generate a content page. Contrary to the Examiner's assertion, Pollock does not teach or suggest transformation techniques as claimed. Pollock, by contrast, solely teaches an author of an HTML page how to properly set parameter values that define the size of an images that is to appear on the page, e.g., creating a proper page markup code for presentation of an image at a given pixel size. In other words, Pollock teach an author proper HTML syntax for presentation of an image in a page, not a transformation technique that is applied to content to thereby generate a content page. Because Pollock fails to teach transformation techniques, the art cited by the Examiner fails to render

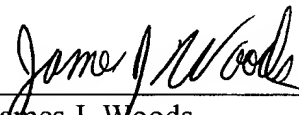
independent claims 22 and 29 obvious. For at least these reasons, Applicants respectfully request withdrawal of the rejection and allowance of the same.

The dependent claims of the present Application contain additional features that further substantially distinguish the invention of the present application over the prior art of record. Given the applicants' position on the patentability of the independent claims, however, it is not deemed necessary at this point to delineate such distinctions.

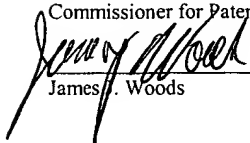
For at least all of the above reasons, Applicants respectfully request that the Examiner withdraw all rejections and objections, and allowance of all the pending claims is respectfully solicited. To expedite prosecution of this application to allowance, the examiner is invited to call the applicants' undersigned representative to discuss any issues relating to this application.

Respectfully submitted,

Dated: 1/9/04


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1/9/04
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